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REMARKS

Claims 1-25 are pending in the present application. In the above amendments, claims 1-4, 8-14, 16-17, and 19-22 have been amended.

In the Office Action mailed May 5, 2005, the Examiner rejected claims 1, 8-14, 16, and 17 under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner rejected claims 1-2 under 35 U.S.C. §101 as lacking requisite tangible hardware to establish statutory basis.

The Examiner rejected claims 1-4 and 8-25 under 35 U.S.C. § 102(b) as being anticipated by the KASUMI Specification. Claims 5-7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the KASUMI Specification in view of the admitted prior art.

Applicant respectfully responds to this Office Action.

35 U.S.C. §112 and 35 U.S.C. §101

The Examiner points out antecedent basis issues and clarity issues with respect to rounds, functions, and sub-key generators. These issues are addressed in the above amendments.

To clarify, note that the specification as filed describes a KASUMI round which is clearly a circuit (i.e. element 400), and also refers to rounds in the algorithmic sense defined in the KASUMI Specification. One of skill in the art will recognize which definition is appropriate based on the context. Nonetheless, in order to clarify the intended scope, "KASUMI round" has been amended to "KASUMI round circuit" in the above amendments.

Applicant further believes that the above amendments address the Examiner's §101 concerns as well.

35 U.S.C. §102

The standard for anticipation under §102 requires "the presence in a single prior art disclosure of all elements of a claimed invention arranged as in that claim." *Carella v. Starlight Archery & Pro Line Co.*, 804 F.2d 135, 138, 231 U.S.P.Q.D (BNA) 644, 646 (Fed. Cir. 1998) (*quoting Panduit Corp. v. Dennison Mfg. Co.*, 774 F.2d 1082, 1101, 227 U.S.P.Q. (BNA) 337, 350 (Fed. Cir. 1985)) (*additional citations omitted*). As discussed further below, the Examiner

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has failed to identify each and every claim limitation, as set forth below. Thus, the Examiner has failed to set forth a prima facie case of anticipation, and the rejections to claims 1-4 and 8-25 should be withdrawn. Furthermore, the amendments made to clarify the scope in response to the §112 and §101 rejections will also make clear that the KASUMI Specification does not anticipate the claims of the present application, as amended. Example limitations not found in the KASUMI Specification are listed below. Those listed are not exhaustive.

Note that, with respect to the various claims, the KASUMI Specification is silent with respect to KASUMI round circuits, calculation controllers, memory for storing outputs, selectors as recited in various claims, partial round calculators, input muxes, datapath muxes, intermediate values, registers, shift registers, and various other elements recited in the claims. Therefore, the rejections under §102 should be withdrawn.

35 U.S.C. §103

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation of, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference(s) must teach or suggest all the claim limitations.

For each §103(a) rejection in this Office Action, Applicants submit that the elements of the claim are not taught in either reference, as described above with respect to §102. Therefore, the rejections under §103 should be withdrawn.

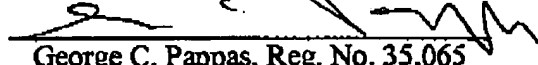
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REQUEST FOR ALLOWANCE

In view of the foregoing, Applicant submits that all pending claims in the application are patentable. Accordingly, reconsideration and allowance of this application is earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,

Dated: _____

By: 
George C. Pappas, Reg. No. 35,065
858-651-1306

QUALCOMM Incorporated
5775 Morehouse Drive
San Diego, California 92121
Telephone: (858) 651-4125
Facsimile: (858) 658-2502

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